IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

La Unión del Pueblo Entero, et al.,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	
	§	Case No. 5:21-cv-00844-XR
STATE OF TEXAS, et al.,	§	[Lead Case]
	§	
Defendants.	§	
	§	
HARRIS COUNTY REPUBLICAN PARTY, et al.,	§	
	§	
Intervenor-Defendants.	§	

DISTRICT ATTORNEY OGG'S OBJECTIONS TO LUPE PLAINTIFFS' EXHIBIT LIST

Exh. No.	Document Description	Objections
LUPE-1	Expert Report of Dr. Andres Tijerina, PhD, February 2022	FRE 702, 801 et seq.
LUPE-2	Expert Report of Dr. Douglas L. Kruse, PhD, February 2022	FRE 702, 801 et seq.
LUPE-3	Expert Report of Dr. Henry Flores, PhD, February 2022	FRE 702, 801 et seq.
LUPE-4	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-5	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-6	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-7	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-8	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-9	Travis County, Revised Mail Ballot Carrier Envelope	

Exh. No.	Document Description	Objections
LUPE-10	Travis County Spreadsheet, Rejected Mail Ballots, November 2022	
LUPE-11	Travis County Spreadsheet, Mail Ballot Statuses, November 2022	
LUPE-12	Email from Todd Forrister to Travis County Elections, March 2023	FRE 801 et seq.
LUPE-13	SOS Presentation, Opportunity to Correct Defects on Application for Ballot by Mail and Carrier Envelope, February 2022	
LUPE-14	El Paso County Spreadsheet, List of voters who received assistance or voted curbside, March 2020	
LUPE-15	Email from Melissa Rosales to Lisa Wise, May 2017	FRE 801 et seq.
LUPE-16	Travis County, General Election Signed Oaths of Assistance/Combined early voting oaths of assistance, November 2020	
LUPE-17	Email from Andres Candelaria to Lisa Wise, March 2022	FRE 801 et seq.
LUPE-18	El Paso County Presentation, Early Voting Election Worker Training March 2022 Primary Election, March 2022	
LUPE-19	SOS Presentation, Poll Watchers, July 2023	
LUPE-20	Email from Texas SOS Press Office to Lisa Wise, September 2022	
LUPE-21	El Paso County Spreadsheet, 2022 December 2022Runoff - Ballot List, December 2022	
LUPE-22	El Paso County Spreadsheet, 2022 November General - Ballot List, November 2022	
LUPE-23	El Paso County Spreadsheet, List of voters who needed assistance, December 2022	
LUPE-24	El Paso County Spreadsheet, List of voters who recieved assistance, November 2022	
LUPE-25	Email from SOS Elections Internet to Election Officials, October 2022	
LUPE-26	El Paso County, Analysis of voters with and without SSN, SSN4, or driver's license, Post-March 2022	
LUPE-27	El Paso County, Standardized Notices of Rejected Application for Ballot by Mail	
LUPE-28	El Paso County, Oath of Assistance Logs, November 2022	

Exh. No.	Document Description	Objections
LUPE-64	Dallas County Spreadsheet, Mail Ballot Return Statuses for Constitutional Amendment Election, May 7, 2022	
LUPE-65	Dallas County Spreadsheet, Mail Ballot Return Statuses for Primary Election, March 1, 2022	
LUPE-66	Dallas County Spreadsheet, Voter Assistance Complaint Log	
LUPE-67	Dallas County Spreadsheet, Poll Watcher Complaint Log	
LUPE-68	Hidalgo County, Analysis of voters with and without SSN, SSN4, or driver's license, January 2022	
LUPE-69	Hidalgo County, Poll Watcher Observations, November 2020	FRE 801 et seq.
LUPE-70	Hidalgo County, Affidavit of Stephanie Seiba Poll Watcher 2020, November 2020	FRE 801 et seq.
LUPE-71	Hidalgo County, Affidavit of Thelma Leal Poll Watcher 2020, November 2020	FRE 801 et seq.
LUPE-72	Hidalgo County, 2022 Primary Election Ballot List Requested Between January 1, 2022 and March 24, 2022, March 2022	
LUPE-73	Hidalgo County, Absentee Rejection Letter List Mail Dates August 1, 2022 to November 8, 2022, December 2022	
LUPE-74	SOS, Election Advisory No. 2022-07, NEW LAW: Changes to earl Voting by Personal Appearance - House BIII 2025, House Bill 3107, and Senate Bill 1, January 2022	
LUPE-75	Email from Jacey Jetton to Alan Vera, August 2021	FRE 801 et seq.
LUPE-76	Email from Malissa Kouba to Kristy Noble, January 2022	FRE 801 et seq.
LUPE-77	Email from Michael Scarpello to Clay Jenkins et al., December 2021	FRE 801 et seq.
LUPE-78	Email from Michael Scarpello to Clay Jenkins et al., February 2022	FRE 801 et seq.
LUPE-79	Email from Michael Scarpello to Clay Jenkins et al., Feburary 2022	FRE 801 et seq.
LUPE-80	Email from Michael Scarpello to Kristy Noble, Feburary 2022	FRE 801 et seq.
LUPE-81	SOS, Early Voting Ballot Board & Signature Verification Committee Handbook for Election Judges and Clerks 2022	
LUPE-82	Email from Alan Vera to Jacey Jetton et al., July 2021	FRE 801 et seq.

Exh. No.	Document Description	Objections
LUPE-83	Email from Alan Vera to Jacey Jetton, et al., August 2021	FRE 801 et seq.
LUPE-84	Alan Vera Presentation, 2020 Texas Poll Watcher Training	FRE 801 et seq.
LUPE-85	Email from Alan Vera to Cody Jordan, March 2021	FRE 801 et seq.
LUPE-86	Email from Alan Vera to Cody Jordan, March 2021	FRE 801 et seq.
LUPE-87	Email from Alan Vera to Hope Shelton, March 2021	FRE 801 et seq.
LUPE-88	Email from Adam Bitter to Wes Bowen, et al, November 2021	FRE 801 et seq.
LUPE-89	Dallas County Republican Party Executive Committee Resolution, March 2021	
LUPE-90	SOS, Election Advisory No. 2021-23, May 2022	
LUPE-91	SOS Presentation, Preparing for the May 2022 Elections, December 2021	
LUPE-92	OAG Spreadsheet, Election Fraud Violations, Prosecutions Resolved, November 2021	
LUPE-93	OAG Spreadsheet, Election Fraud Violations, Prosecutions Pending, November 2021	
LUPE-94	Email from SOS Elections Internet to Election Officials, January 2022	
LUPE-95	Email from SOS Elections Internet to Election Officials, January 2022	
LUPE-96	Blank Form, Notice of Rejected Application For Ballot By Mail, January 2022	
LUPE-97	Instructions to Oath of Assistance and Interpreter Form, January 2022	
LUPE-98	Email from KC Emery to Christina Adkins, October 2021	FRE 801 et seq.
LUPE-99	Blank Form, Notice of Rejected Application for Ballot by Mail, Missing or Incorrect Personal Identification Number, January 2022	
LUPE-100	Blank Form, Notice of Carrier Defect, Carrier Envelope Returned to the Voter by Mail, January 2022	
LUPE-101	Blank Form, Notice of Carrier Defect, Voter Notified of Carrier Envelope Defect by Phone or Email, January 2022	
LUPE-102	Email from Kim Bergmann to Ruth Hughs, September 2020	FRE 801 et seq.
LUPE-103	Letter from Ken Paxton to Wiley B. McAfee, Opinion No. KP-0118, November 2016	

Exh. No.	Document Description	Objections
LUPE-167	Blank Form, Certificate of Appointment of Poll Watcher by a Candidate, January 2022	
LUPE-168	Email from SOS Elections Internet to Elections Officials, September 2022	
LUPE-169	Email from Adam Bitter to Allison Heinrich, June 2022	
LUPE-170	Email from Christina Adkins to Jacquelyn Callanen, April 2022	
LUPE-171	Email Attachment, SOS Draft Insert for Mail Ballot Carrier Envelope, April 2022	
LUPE-172	Blank Form, Oath of Assistance and Oath of Interpreter, July 2022	
LUPE-173	Email from Sam Taylor to John Scott et al., August 2022	FRE 801 et seq.
LUPE-174	Email from Sam Taylor to John Scott et al., November 2022	FRE 801 et seq.
LUPE-175	Email from Heidi Martinez to Stephanie Garza, March 2022	FRE 801 et seq.
LUPE-176	Kleberg County, Draft Carrier Envelope Insert, March 2022	
LUPE-177	SOS Presentation, Poll Watchers, August 2022	
LUPE-178	In re True Texas Elections, LLC Political Action Committee and Laura Pressley in Her Official Capacity as Treasurer of True Texas Elections, LLC Political Action Committee, Petition for Writ of Mandamus (TX Sup. Court Oct. 13, 2022)	FRE 801 et seq.
LUPE-179	Election Complaint to the Texas Secretary of State, Harris County, Richard Joseph***, November 2022	FRE 801 et seq.
LUPE-180	SOS Presentation, 2021 Legislative and Policy Updates, November 2022	
LUPE-181	SOS Presentation, Communicating Legislative Changes: ID Requirements for Voting by Mail, February 2023	
LUPE-182	Guadalupe County, Office of the Attorney General Law Enforcement Division, Election Code Violation, Incident Report, Incident No. CX1078159982, March 2022	
LUPE-183	Hays County, Office of the Attorney General Law Enforcement Division, Election Code Violation, Incident Report, Incident No. CX8296185757, November 2022	

Exh. No.	Document Description	Objections
LUPE-203	Certificate of Completion, Jim Lewin, Texas Online Poll Watcher Training, August 2022	
LUPE-204	Texas Impact March 2022 Election Event Accouncement	FRE 801 et seq.
LUPE-205	Email from Tanesa Lee to Danielle Ayers, February 2022	FRE 801 et seq.
LUPE-206	Friendship West Presentation Regarding Voting, March 2022	FRE 801 et seq.
LUPE-207	Texas Impact et al., Presentation, Tips for Voters New Election Laws 2022	FRE 801 et seq.
LUPE-208	Email from Texas Impact Member to Bee Morehead, September 2021	FRE 801 et seq.
LUPE-209	Texas Impact, Texas Election Law Update, November 2021	FRE 801 et seq.
LUPE-210	Texas Impact, Action Page, January 2022	FRE 801 et seq.
LUPE-211	Friendship West Presentation, Justice Ministry Voter Engagement - Follow-up Meeting, March 2022	FRE 801 et seq.
LUPE-212	Friendship West Justice Ministry Presentation, Poll Worker Information Session, August 2022	FRE 801 et seq.
LUPE-213	Email from Cheryl Prelow to Danielle Ayers et al., July 2022	FRE 801 et seq.
LUPE-214	Friendship West Podcast Script, New Texas Voting Law, July 2022	FRE 801 et seq.
LUPE-215	Friendship West Baptist Church, Post-Election Survey Report, December 2022	FRE 801 et seq.
LUPE-216	Friendship West Baptist Church, Pre-Election Survey Report, December 2022	FRE 801 et seq.
LUPE-217	BallotReady Invoice to Texas Impact, July 2022	FRE 401
LUPE-218	Texas Impact BallotReady Order Form, July 2022	FRE 401
LUPE-219	BallotReady Invoice to Texas Impact, August 2022	FRE 401
LUPE-220	BallotReady Invoice to Texas Impact, August 2022	FRE 401
LUPE-221	Memorandum of Understanding between Texas Impact and New Venture Fund, September 2022	FRE 401, 801 et seq.
LUPE-222	Rejected Application for Ballot by Mail, Rabia	
LUPE-223	Tarrant County, Notice of Rejected Application for Ballot by Mail, October 2022	
LUPE-224	Email from Christina Adkins to Andria Perales, January 2022	